

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

SARAH H. BLACK and KATHERINE BLACK,
on behalf of her minor children D.B. and J.B.,

Plaintiffs,

v.

ANTHONY DAIN, CHERIE WRIGLEY, IRA
SALZMAN, MELISSA COHENSON, BRIAN A.
RAPHAN, P.C., PAMELA KERR, ESAUN G.
PINTO, and CPI INVESTIGATIONS,

Defendants.

Case No. 1:16-cv-01238 (CBA) (ST)

**DECLARATION OF
SHARAN R. ABRAHAM
IN OPPOSITION TO
DEFENDANTS'
MOTION TO STAY**

SHARAN R. ABRAHAM, pursuant to 28 U.S.C. § 1746, states as follows:

1. I am an attorney for Plaintiffs in this action.
2. I submit this Declaration in Opposition to Defendants' Motion to Stay.
3. Annexed hereto as **Exhibit A** is a true and correct copy of the May 17, 2018 Colorado Court of Appeals Order staying the Issuance of the Mandate.
4. Annexed hereto as **Exhibit B** is a true and correct copy of January 25, 2018 Court of Appeals Order Vacating and Remanding Court of Appeals Case No. 16CA0625.
5. Annexed hereto as **Exhibit C** is a true and correct copy of a Motion to Recuse the Honorable Elizabeth Leith from Further Probate Court Proceedings, submitted to the Denver Probate Court on February 1, 2018. Due to the extensive length of exhibits to this motion (57 pages), they are not attached. The exhibits to the Recusal Motion are already available to Defendants and Plaintiffs will provide them to the Court if requested.
6. Annexed hereto as **Exhibit D** is a true and correct copy of the FINRA Arbitration Award, issued on March 23, 2018, ordering that the SNT and Issue Trust accounts remain frozen as to litigation expenses.

7. Annexed hereto as **Exhibit E** is a true and correct copy of an email chain between Defendant Dain and Bernard and Samuel Black.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on July 27, 2018

/s/ Sharan R. Abraham
Sharan R. Abraham